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UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

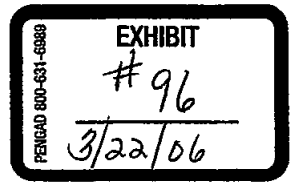
GLAXO GROUP LIMITED, Plaintiff, v. TEVA PHARMACEUTICALS USA, INC. AND TEVA PHARMACEUTICAL INDUSTRIES LIMITED, Defendants.	Civil Action No. 04-171 (KAJ)

NOTICE OF DEPOSITION
PURSUANT TO RULE 30(b)(6), FED. R. CIV. P.

TO: Mark D. Schuman
Merchant & Gould
3200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

Josy W. Ingersoll (#1088)
Young, Conaway, Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899

PLEASE TAKE NOTICE that commencing on October 14, 2005, at 10:00 a.m. at the offices of Morgan, Lewis & Bockius, LLP, 101 Park Avenue, New York, New York 10178, or at such other mutually agreeable time and location, plaintiff Glaxo Group Limited ("Glaxo") will take the deposition of defendant Teva Pharmaceutical USA, Inc. pursuant to Rule 30(b)(6), Fed. R. Civ. P. by and through one or more officer(s), director(s), managing agent(s), or other persons designated to testify on its behalf as the most knowledgeable person(s) with respect to the below listed subject matter categories. The deposition(s) will be taken before a Notary Public or other person authorized to administer oaths, and will be recorded by stenographic means and/or videotape. The definitions on the attached Schedule A will apply to this notice.



1. The document retention and/or document destruction policies of Teva.

2. The locations where Teva stores or retains documents and/or electronic records (including but not limited to, laboratory notebooks, internal memoranda, etc.), products, samples and/or experimental materials relating to all correspondence or submissions to the FDA that are in support of Teva's ANDA for ranitidine hydrochloride oral solution.

3. The existence of all electronic or paper-based databases, indices, logs or other lists or data, information or document compendiums that contain any information relating to or in support of Teva's ANDA and that are maintained by Teva or any contractor that Teva (or any predecessor including Novopharm Limited) hired or engaged in support of its efforts to develop ranitidine hydrochloride oral solution.

4. The status of all correspondence or submissions to the FDA, including all updates, supplemental submissions, or FDA requests and responses thereto, relating to Teva's ANDA for ranitidine hydrochloride oral solution.

5. The development and submission of Teva's ANDA and how that document is created, maintained, stored or archived, and updated by or for Teva.

6. The manner in which paper and non-paper documents, storage media (electronic, optical, CD, DVD, or other storage media), data, information and products or samples relating to ranitidine hydrochloride oral solution are kept in the ordinary course of business at Teva.

7. The process by which laboratory notebooks, and paper and non-paper internal memoranda and reports relating to ranitidine hydrochloride oral solution are, and have been, distributed, stored and maintained over time at Teva.

8. The process by which laboratory notebooks relating to ranitidine hydrochloride oral solution are, and have been, assigned, used, signed, witnessed, stored, sent to storage or archived at Teva.

9. The search for and collection of documents responsive to Plaintiff Glaxo's First Set of Requests for the Production of Documents and Things served September 15, 2004.

Defendant shall identify to counsel for Plaintiff Glaxo the witness or witnesses designated to testify on its behalf for the above categories five (5) days before the deposition.

The deposition(s) will be conducted before a Notary Public or other officer authorized by law to administer oaths, and shall continue from day-to-day until completed. You are invited to attend and participate.

Dated: September 19, 2005

Respectfully submitted,

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Attorneys for Plaintiff, Glaxo Group Limited

SCHEDULE A

Definitions

1. "Teva" means defendants Teva Pharmaceuticals, USA, Inc. and Teva Pharmaceutical Industries Limited and any predecessor, successor, parent, subsidiary, division or affiliate, or their officers, directors, agents and/or employees including, but not limited to Novopharm Limited.

2. The term "Teva's ANDA" or "ANDA" shall mean Abbreviated New Drug Application No. 76-937 for Ranitidine Oral Solution, 15 mg/ml.

3. The term "ranitidine hydrochloride oral solution" includes the drug, substance or product that is the subject of Teva's ANDA.

4. "Document" has the broadest meaning accorded to it by Rule 34 of the Federal Rules of Civil Procedure, and includes, but is not limited to, all of the matters defined in Rule 1001 of the Federal Rules of Evidence.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the within **NOTICE OF DEPOSITION PURSUANT TO RULE 30(b)(6)** was served this 19th day of September, 2005, by Facsimile and Federal Express Mail upon the following:

Mark D. Schuman, Esq.
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and

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